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Attorneys for Creditor
PHILIP VERWEY d/b/a
PHILIP VERWEY FARMS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In Re
PG&E CORPORATION
and
PACIFIC GAS AND ELECTRIC
COMPANY,
Debtors.

Bankruptcy Cases
19-30088-DM (Lead Case)
19-30089-DM

(Jointly Administered)

**NOTICE OF CONTINUED HEARING ON
PHILIP VERWEY FARMS' MOTION FOR
RELIEF FROM AUTOMATIC STAY TO
EXERCISE SETOFF PURSUANT TO 11
U.S.C. §§ 362 AND 553**

☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Corporation
☒ Affects both Debtors

(11 U.S.C. §§ 362(d), 553(a), 562)

**All papers shall be filed in the Lead Case
No. 19-30088 DM

PLEASE TAKE NOTICE, that Creditor Philip Verwey d/b/a Philip Verwey Farms ("PVF")
filed a motion for relief from automatic stay pursuant to 11 U.S.C. § 362(d)(1) on April 1, 2019, to
exercise a setoff against Debtor Pacific Gas and Electric Corporation (hereinafter "Motion").

PLEASE TAKE NOTICE, that the Motion originally set for a hearing on April 24, 2019, at
9:30 a.m., before the Honorable Dennis Montali at the United States Bankruptcy Court for the
Northern District of California, San Francisco Division, located at 450 Golden Gate Avenue, 16th
Floor, Courtroom 17, San Francisco, CA 94102 is now continued to May 9, 2019 at 9:30 a.m. PST, at

1 the same location.

2 **PLEASE TAKE NOTICE**, that the Motion is based on the Memorandum of Points and
3 Authorities filed concurrently, the Declaration of Philip Verwey In Support Of Motion For Relief
4 From Automatic Stay To Exercise Setoff and the attachments and exhibits thereto, and on other and
5 further evidence the Court may consider at or before any hearing on the Motion.

6 **PLEASE TAKE NOTICE**, that a the relief requested may be granted without a hearing if no
7 objection or response to Motion (“Opposition”) is timely filed and served in accordance with the
8 Amended Order Implementing Certain Notice and Case Management Procedures issued March 27,
9 2019, that is in writing and conforms to the Federal Rules of Bankruptcy Procedure (“Bankruptcy
10 Rules”) and the Local Bankruptcy Rules for the Northern District of California (“Local Rules”). This
11 Notice of Continued Hearing shall not prejudice PVF’s right to object to an Opposition or move the
12 Court to request relief under any and all Bankruptcy Rules and/or Local Rules applicable to this
13 Motion.

14 **PLEASE TAKE NOTICE**, that as provided by Local Rule 4001-1(a), the Debtor, Pacific Gas
15 & Electric Company, is advised to appear personally or by counsel at the preliminary hearing; and that
16 failure to appear may result in the Court granting relief requested by this Motion without further
17 hearing, including the lifting of the automatic stay for PVF to effectuate a setoff against its prepetition
18 claims against the Debtor.

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20 Dated: April 23, 2019

McCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP

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23 By: /s/ H. Annie Duong
24 H Annie Duong
25 Attorneys for Creditor
PHILIP VERWEY d/b/a
PHILIP VERWEY FARMS

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